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February 16, 2023

VIA ECF

The Honorable Pamela K. Chen
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *IME Watchdog v. Safa Abdulrahim Gelardi*, 1:22-cv-1032 (PKC) (JRC)

Dear Judge Chen:

This firm represents Defendant Nicholas Liakas in the above-referenced matter.

Mr. Liakas' deadline to respond to the First Amended Complaint ("FAC") is currently set for February 23, 2023 (Doc. 136). I write to request an extension to April 24, 2023, to respond to the FAC. This extension is necessary to allow for Mr. Liakas to engage in settlement discussions with Plaintiff. This is Mr. Liakas' first request for such an extension. Counsel for Plaintiff agreed to this extension in an email to me on February 15, 2023. No other deadlines are affected by this request for an extension.

Thank you for your consideration of this request.

Respectfully,

**CLAYMAN ROSENBERG
KIRSHNER & LINDER, LLP**

/s/ James F. Valentino

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Cc: The Honorable James R. Cho and Counsel of Record (via ECF)